



## Standards & Technology

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There are two ways that an individual can participate on a TIA engineering committee, subcommittee or working group of a subcommittee. The first (and most common way) is for a company to become a corporate member of TIA. If your company is eligible for TIA membership and has paid its membership dues to TIA's membership department, an individual from the member company may participate in the engineering committees or subcommittees at no additional cost. It should be noted that only one voting member is allowed per company, committee or subcommittee. Additional representatives for the same company on the same subcommittee are designated as "non-voting" members. For more information on TIA corporate membership, please contact Jim Berkenbaugh at (703) 907-7714, [jberkenb@tia.eia.org](mailto:jberkenb@tia.eia.org), or [click here](#).

The second option for participation is for a company to pay "non-member engineering participation fees." This option is exercised by a company that is eligible for TIA membership, but chooses not to join as a corporate member and still desires to participate actively on the engineering committee or subcommittee. A company or organizations that is not eligible for TIA membership may also participate by paying the appropriate "non-member engineering participation fee." The fees for committee, subcommittee or working group sponsored by each division in TIA ([Wireless Communications](#), [User Premises Equipment](#), [Fiber Optics](#), [Network Equipment](#) and [Satellite Communications](#)) vary according to the level of activity within the respective committee and are assessed on an annual basis. For more information on the fees associated with the formulating groups in which you are interested in participating, please contact Susan Hoyler at (703) 907-7704, [shoyler@tia.eia.org](mailto:shoyler@tia.eia.org), or Billie Zidek-Conner at (703) 907-7706, [bzidekco@tia.eia.org](mailto:bzidekco@tia.eia.org).

Finally, it should be noted that individuals from the federal, state and local government are allowed to participate at no cost as a "non-voting" member on the various committees. TIA has reciprocal agreements with other industry trade associations and permits individuals from these associations to participate on the standards-setting engineering committees as a "non-voting" member.

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# Standards & Technology

## Advisory Note #3

**To:** TR and FO Committee and Subcommittee Chairmen  
**From:** Peter Bennett  
**Date:** May 24, 1993  
**Subject:** Interim Standards (Trial Use Standards)

With the next revision of the TIA Engineering Manual, we will officially drop the use of the term "Trial Use Standard" and return to the name "Interim Standard". You may begin this practice immediately.

Interim Standards are issued where there is an urgent need for a standard, but the technology isn't stable enough for the issuance of an American National Standard.

It is important to remember that Interim Standards first issued under the TIA process (i.e., after our accreditation on January 30, 1992) have a maximum lifetime of three years, after which an Interim Standard will be rescinded administratively if it has not, during that period, been recognized as an American National Standard. Interim Standards must be revised, reaffirmed, or rescinded every year.

Interim Standards first issued under the EIA system (before January 30, 1992) have a maximum lifetime of five years.

This revised advisory replaces the version dated March 26, 1992

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**Manufacturers' Evaluation of Relative Feasibility of Punchlist Features**  
(Revised following December 3, 1997 Industry/FBI Engineering Summit)

**Most Difficult**

Separated Content

**Extremely Difficult**

Network Signals

**Extremely Difficult to Difficult**

Feature Status

Message on Status of Surveillance

**Difficult**

Dialing Information

Timing

Conversations of Parties on Hold

**Difficult to Less Difficult**

Feature Keys

Who is Part of a Call at All Times

**Less Difficult**

Continuity (tone) Check

Standard Delivery Interface



MEMORANDUM

December 5, 1997

To: Participants in December 3, 1997 Industry/FBI Engineering Summit

From: Grant Seiffert (202) 383-1483

Re: Overhead Summary of FBI Comments/Clarifications of the Punchlist

On December 3, 1997, engineers from telecommunications carriers and manufacturers and the Federal Bureau of Investigation conducted an engineering summit at TIA's offices in Arlington, Virginia. The purpose of the meeting was to discuss the twelve enhanced surveillance features requested by law enforcement ("the Punchlist").

The summit evolved from a November 12, 1997 meeting with Assistant Attorney General Steve Colgate. At the November meeting, Mike Warren, Section Chief for the CALEA Implementation Section (CIS) at the FBI, commented that he believed that industry was misinterpreting law enforcement's requests and that it might be possible to clarify these requests in such a way as to reduce the technical difficulty of providing the features.

During the summit, the FBI and other representatives of law enforcement responded to questions from industry manufacturers and elaborated upon the purpose for the twelve features. In general, law enforcement indicated that it is willing to compromise on what features each individual manufacturer provides and that it accepts that each manufacturer may not be able to provide every punchlist item.

In several instances (for example, timing, standard delivery interface, and feature status message), these discussions resulted in clarifications that appeared to reduce the technical difficulty of providing the feature. In at least one case (i.e., message of status surveillance), the clarification increased the perceived difficulty. The purpose of the summit was not to negotiate an industry/law enforcement agreement on each feature, simply to answer industry questions and clarify law enforcement's requests.

Overhead summaries of law enforcement's comments/clarifications were reviewed by all participants during the meeting for their accuracy. In addition, the clarifications were reviewed by the FBI for a second time yesterday. The final version of these overheads (with the FBI's subsequent comments underlined) is attached.



**facsimile**  
**TRANSMITTAL**

---

**To:** Stewart Baker  
**Of:** Steptoe & Johnson  
**Fax:** 202-429-3902  
**Pages:** 4, including this cover sheet.  
**Date:** December 4, 1997

The following is the list of discussion points from yesterday's meeting. We have provided our comments which we've underlined. As mentioned in the meeting, the FBI is working in coordination with state and local law enforcement and will need their concurrence on each of these items.

From the desk of...

Dave Yarbrough  
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FBI Clarifications/Comments on "Punchlist" Features  
(December 3, 1997)

General Comments:

This is a discussion paper produced during a meeting between law enforcement officials from the CALEA Implementation Section (CIS) and members of the Telecommunications Industry. It does not change government's requirements for the punch list. It does further clarify government's requirements and reflect flexibility for delivery of information. The law enforcement forum will need to review this paper. It is anticipated this review will occur December 18, 1997.

- Re: test suites -- Government will tailor what is compliant for each platform
- Willing to compromise on what the manufacturer provides; accepts that the punch list items may not be reasonably achievable by all manufacturers; manufacturer does not have to redesign its architecture

1. Timing (Capability 5)

- "Near real time" -- up to 10 seconds for 99% of calls (with in-band serial number on CCC linking call content to events); 3-5 seconds for 99% of calls (without serial number); 30 seconds unacceptable
- Manufacturer defines own demarcation point. Demarcation point is the point which separates network equipment and the government's transmission facilities
- More flexible for less important events; cross-reference to LE ballot comments which identify critical events

2. Standard Delivery Interface (Capability 8)

- Law enforcement does not expect a single interface; would prefer a limited set
- Willing to take what industry offers, but would prefer no more than 4 standard interfaces
- Willing to use manufacturers' preferred interface; interface will not necessarily be standardized but will be set through individual agreements between law enforcement and manufacturer-carrier pairings

3. Feature Status Message (Capability 9)

- Government does not require immediate notification; (e.g the 500 msec recommendation); willing to have this information on a regular basis once a day, not less than once every 24 hours) or [other solutions]
- Interested in a defined set of features that the feature status message would be used for (those that could hinder law enforcement's ability to conduct the intercept); exclude one-time features which all customers of a carrier receive simply by initiating service

**4. Network Signals (Capability 4)**

- Not interested in all network signals; interested in a defined sub-set of user-perceived signals (each manufacturer is invited to provide its list of signals and law enforcement will identify the sub-set)
- Some user-perceived signals can be heard on the CCC and in those circumstances LE is willing to accept access to the CCC as opposed to separate signals on the CDC, but would prefer a separate message on the CDC

**5. Conference Calling: Who is Part of a Call at All Times (Capability 2)**

- Only applies to reporting the switching connections made or broken by the switches supporting the subject's service; this does not apply to customer premises equipment (e.g., handset)

**6. Conference Calling: Conversations of Parties on Hold (Capability 1)**

- Only covers conversations of two or more parties on hold
- If there is only one party on hold, there is no intercept requirement on that party
- This requirement covers not only parties "on hold" but also conversations continuing after the target hangs up, provided that the other parties continue to maintain their connection on that switch
- If the call is no longer maintained in the switch(es) serving the intercept subject, there is no requirement to continue the intercept
- 

**7. Dialing Information (Capability 10)**

- Two ways to provide dialing information: (1) decipher and create messages for dialed digits, (2) provide CCC to law enforcement for deciphering
- If the solution involves DTMF, it is not necessary to provide a dedicated tone receiver for each intercept subject (at most, a receiver will be required for each simultaneous, in progress, intercept call)

**8. Feature Keys (Capability 3)**

- Probably harder for wireline than wireless because, at this time, wireless has fewer feature keys
- LE only talking about physical keys which activate features for the intercept subject.

**9. "Toggles"**

- If a manufacturer's customers agree to accept all punchlist features, toggling capability will not be necessary
- Some features (timing, standard interface, etc.) cannot be toggled
- LE willing to discuss with individual carriers and their manufacturers the possibility of grouping features to reduce cost of toggling
- In some cases, toggling will be difficult because it will require changes in hardware

**10. Status of Surveillance: Message on Status of Surveillance (Capability 6)**

- This is harder for wireless than wireline
- LE wants a message, which may be based on a poll, to determine that the interception is active on all nodes essential to the intercept
- This is more demanding than some manufacturers originally thought (because it requires checking so many distributed points)

**11. Status of Surveillance: Continuity (tone) Check (Capability 7)**

- LE interested in standard C-tone or some other signal indicating that connection is up

**12. Separated Content (Capability 12)**

- All parties recognize that this is the most difficult item on the list

## CERTIFICATE OF SERVICE

I, L. Benjamin Ederington, an attorney in the law firm of Steptoe & Johnson, L.L.P., hereby certify that I have on this December 14, 1998 caused to be served by first class mail, postage prepaid, or by hand delivery, a copy of the foregoing Comments to the following:

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